

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

<b>In re:</b>  <b>FIELDWOOD ENERGY, LLC, <i>et al.</i>,</b>  <b>Debtors.<sup>1</sup></b>	<b>§ Chapter 11</b> <b>§</b> <b>§ Case No. 20-33948 (MI)</b> <b>§</b> <b>§ (Jointly Administered)</b>
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**NOTICE OF WITHDRAWAL WITHOUT PREJUDICE OF MOTION OF  
BP EXPLORATION & PRODUCTION INC. FOR ENTRY  
OF AN ORDER PURSUANT TO 11 U.S.C. § 362(d)  
AUTHORIZING RELIEF FROM THE AUTOMATIC  
STAY TO EFFECTUATE SETOFF OF MUTUAL OBLIGATIONS**

**PLEASE TAKE NOTICE** that BP Exploration & Production Inc. (“BP”) hereby withdraws, without prejudice, the *Motion of BP Exploration & Production Inc. for Entry of an Order Pursuant to 11 U.S.C. § 362(d) Authorizing Relief From the Automatic Stay to Effectuate Setoff of Mutual Obligations* (the “Motion”), filed on June 20, 2021 at Docket No. 1666.<sup>2</sup>

**PLEASE TAKE FURTHER NOTICE** that BP’s withdrawal of the Motion should not be construed in any way as a waiver of BP’s rights and arguments at any time in the future in respect of the issues outlined in the Motion, all of which rights and arguments BP expressly reserves and preserves without limitation.

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<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, as applicable, are: Fieldwood Energy LLC (6778), Fieldwood Energy Inc. (4991), Fieldwood Onshore LLC (3489), Fieldwood SD Offshore LLC (8786), Fieldwood Energy Offshore LLC (4494), Fieldwood Offshore LLC (2930), GOM Shelf LLC (8107), FW GOM Pipeline, Inc. (8440), Galveston Bay Procession LLC (5703), Galveston Bay Procession LLC (0422), Fieldwood Energy SP LLC (1971), Dynamic Offshore Resources NS, LLC (0158), Bandon Oil and Gas, LP (9266), and Bandon Oil and Gas GP, LLC (9172). The Debtors’ primary mailing address is 2000 W. Sam Houston Parkway S., Suite 1200, Houston, TX 77042.

<sup>2</sup> Fieldwood argues in its objection [Docket No. 1843] to the Motion that its obligation to make the \$30 million payment under the MC519 PSA is contingent upon the Genovesa Well first achieving 180 days of production. BP adamantly disagrees, but given the substantial likelihood that this purported contingency will resolve itself by October, out of respect for this Court’s time and resources BP will withdraw the Motion, without prejudice, rather than continuing to litigate this issue. If it becomes necessary, BP reserves and preserves its right to reassert the Motion upon the Genovesa Well achieving 180 days of production.

Dated: July 26, 2021

Respectfully submitted,

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***Counsel for BP Exploration & Production Inc.***

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing pleading has been served upon the parties eligible to receive notice through the Court's ECF facilities by electronic mail on July 26, 2021.

*/s/ Karl D. Burrer*

Karl D. Burrer